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Service:

UNE 2 Wire xDSL

Metric:

PR 4-04

Missed Appointments - Verizon - Dispatch

Performance:

UNE

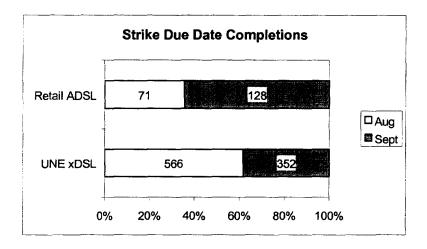
30.38% with 1557 observations

Retail

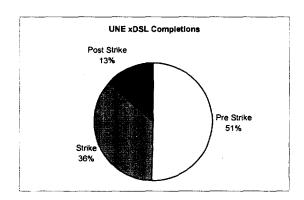
9.89% with 283 observations

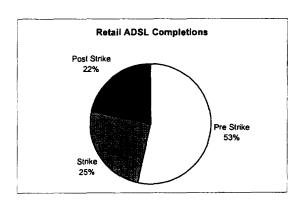
As the following chart indicates, UNE xDSL cleared more than 60% of the orders where the original due dates occurred during the work stoppage ("strike due dates") in August.

By contrast, Retail cleared less than 40% of its orders with strike due dates in August.



This led to a higher percentage of strike related misses for the UNE base, as shown in the next two charts. (Orders are categorized as "pre" or "post" depending on the original due date for the order.)





The greater concentration of orders with strike due dates in the UNE completion base also affected PR 2-02 Average Interval Completed - Total - Dispatch:

<u>VZ</u> 8.15 <u>CLEC</u> 12.04

Service:

UNE 2 Wire xDSL

Metric:

PR 4-02

Average Delay Days - Total

Performance:

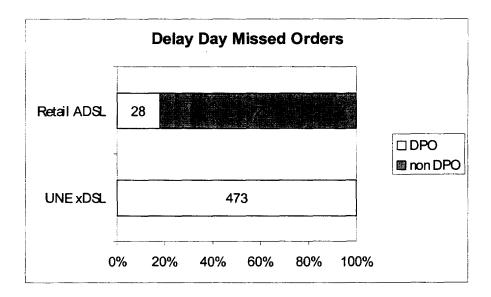
UNE

9.62 with 473 observations

Retail

3.23 with 157 observations

The average delay day metric for xDSL was also impacted by the aggressive effort in August to clear as much of the UNE strike-related backlog as possible. This metric typically averages between 2 and 3 days for both UNE xDSL and Retail ADSL. UNE xDSL degraded to 9.62 days in August due to the large number of orders cleared in the final week of the report month that were originally due during the work stoppage. Retail was able to dampen the effect of their strike-related dispatch completions due to the fact that they also incurred a large number of non-dispatch misses. Non-dispatch misses are typically completed the next day and therefore have very short delay day intervals. As the next chart indicates, the longer-interval dispatch misses accounted for 100% of the UNE delay day base but less than 20% of the Retail base for August.



DPO = Dispatch Orders

Service:

UNE 2 Wire xDSL

Metric:

PR 3-10

UNE

% Completed in 6 Days (1-5 Lines - Total)

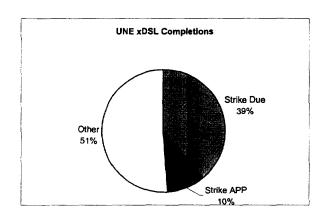
Performance:

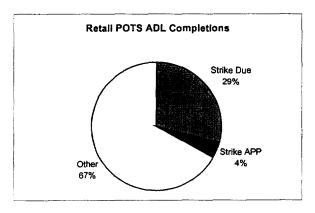
40.29% with 613 observations

Retail ADL

62.93% with 4858 observations

The following analysis illustrates that the proportion of each denominator related to strike due dates and orders received during the strike ("strike app dates") differs substantially. Dispatch orders that were due during the work stoppage or that were received during the work stoppage overwhelmingly failed to meet the 6 day provisioning interval. As shown below, the UNE xDSL base reflected a much larger proportion of both types of strike-related orders and was thus at a sizeable disadvantage in completion interval performance.





Service:

UNE 2 Wire Digital

Metric:

PR 4-04

Missed Appointments - Verizon - Dispatch

Performance:

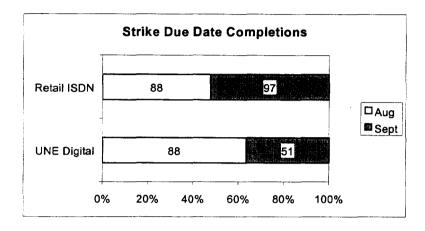
UNE

24.91% with 281 observations

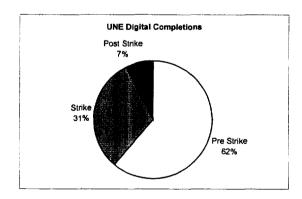
Retail

10.47% with 430 observations

As the following chart indicates, UNE Digital cleared more than 60% of the strike due dated orders in August. Retail cleared less than 50% of its strike due dated orders.



This led to a higher percentage of strike related misses for the UNE base, as indicated in the next two charts. (Orders are categorized as "pre" or "post" depending on the original due date for the order.)





The greater concentration of orders with strike due dates in the UNE completion base also affected PR 2-02 Average Interval Completed - Total - Dispatch:

<u>VZ</u> 11.00 CLEC 13.76

Service:

UNE 2 Wire Digital

Metric:

PR 4-02

Average Delay Days - Total

Performance:

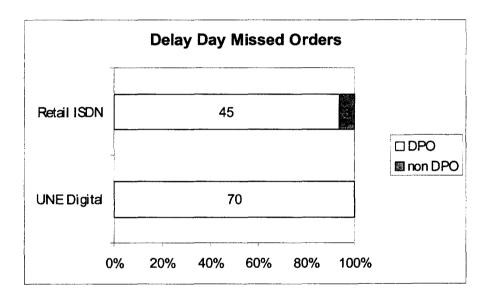
UNE

10.03 with 70 observations

Retail

9.00 with 48 observations

The average delay day metric for 2 wire digital was also impacted by the aggressive effort in August to clear as much of the UNE strike-related backlog as possible. This metric typically averages between 3 and 5 days for both UNE and Retail 2 wire digital. UNE 2 wire digital degraded to 10.03 days in August due to the large number of orders cleared in the final week of the report month that were originally due during the work stoppage. Retail also degraded in August to 9.00; however, Retail also incurred 3 short interval non-dispatch misses which somewhat dampened the impact of their dispatch misses. This accounts for the difference of 1 day in the average delay day performance.



DPO = Dispatch Orders

Service:

UNE Platform

Metric:

PR 4-04

Missed Appointments - Verizon - Dispatch - Platform

Performance:

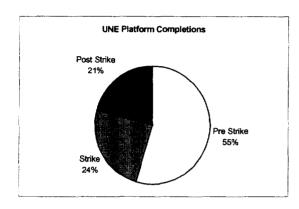
UNE

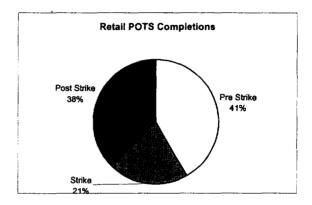
24.24% with 33 observations

Retail POTS

11.17% with 18958 observations

The distribution of strike-related work in the UNE Platform and Retail POTS bases was approximately equal in August 2000.





Since Verizon did not provision dispatch orders (except for emergencies) during the strike, virtually all dispatch orders with strike due dates were missed. Based on the proportion of strike due dated order in the UNE Platform completions in August, a missed appointment rate of about 24% is expected. Actual performance was 24.24%.

For Retail POTS the proportion of strike due dates in the base suggest that the missed appointment rate should be about 21%. The reported retail rate was 11.17%. Verizon is investigating whether retail failed to apply the appropriate missed appointment code on these orders.

Service:

UNE Loop

Metric:

PR 4-04

Missed Appointments - Verizon - Dispatch - Loop New

Performance:

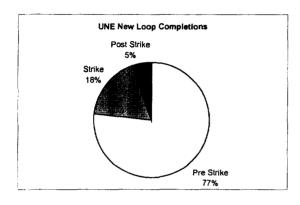
UNE

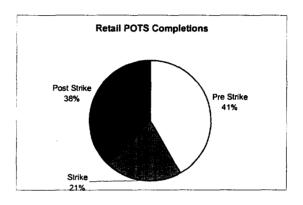
24.66% with 73 observations

Retail POTS

11.17% with 18958 observations

The proportion of strike-related work was slightly larger for Retail POTS than for UNE New Loop.





Based on the proportion of strike due dated orders in the UNE Loop completions in August, a missed appointment rate of about 18% would be expected. In actuality, the performance ran 24.66%. This may be because the provisioning volume for new loops just prior to the work stoppage ran at about double the average daily volume recorded in June and July. This is reflected in the large "pre-strike" component in the UNE Loop base.

For Retail POTS the proportion of strike due dates in the base suggest that the missed appointment rate should be about 21%. The reported retail rate was 11.17%. Verizon is investigating whether retail failed to apply the appropriate missed appointment code on these orders.

Service:

UNE Loop (1-5 Lines)

Metric:

PR 1-03

Avg Int Off - Dispatch

Performance:

UNE

9.64 with 11 observations

Retail

6.95 with 742 observations

There were 11 observations in the UNE base for this metric. A single order was received on 6/23, given a customer requested due date of 8/10, and completed on 8/25. The order should have been "X" coded but was instead "W" coded. Excluding this one order would bring the UNE performance to 7.30 days.

Metric:

PR 2-03

Avg Int Cmp - Dispatch

Performance:

UNE

17.86 with 7 observations

Retail

9.65 with 581 observations

There were 7 observations in the UNE base for this metric, including the order described in metric PR 1-03. This order accounted for 42 days in the completion interval calculation. Excluding this mis-coded order would bring the UNE performance to 13.8 days. The remaining gap between Retail and UNE was caused by one order that was originally due on 7/19 but not completed until after the work stoppage, resulting in a completion interval of 32 days.

Service:

UNE POTS

Metric:

PR 4-02

Average Delay Days - Total

Performance:

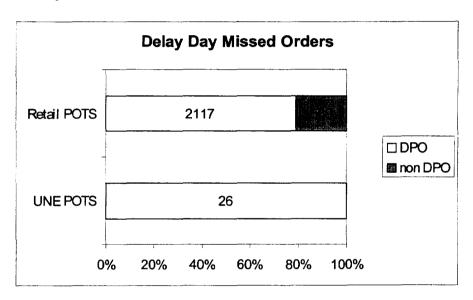
UNE

8.85 with 26 observations

Retail

6.32 with 2686 observations

The average delay day metric for UNE and Retail POTS was impacted by the completion of strike-related work in the final week of August. This metric has historically moved around a great deal due to low volumes for UNE. For the report month of August, the gap between UNE and Retail was largely driven by fact that 20% of the Retail missed appointments were on non dispatch orders which typically are completed the next day and therefore have short delay intervals. These orders offset the longer interval dispatch orders. 100% of the UNE POTS missed orders were dispatched orders.



DPO = Dispatch Orders

Service:

UNE Specials

Metric:

PR 1-07

Average Interval Offered - DS1

Performance:

UNE

24.50 with 14 observations

Retail

18.55 with 304 observations

A single order in the UNE base of 14 orders drove this metric out of parity. That order was incorrectly negotiated with a 137 day provisioning interval. The order was actually provisioned and turned up within 15 days. Excluding this one order from the base would put the average UNE DS1 interval at 15.85 days, well within parity.

Metric:

PR 1-08

Average Interval Offered - DS3

Performance:

UNE

28.58 with 19 observations

Retail

14.50 with 2 observations

Of the 19 UNE DS3 observations, 16 were negotiated with 30 day intervals, 2 with 29 day intervals, and 1 with a 5 day interval. The standard interval guidelines call for a 3 day facility check and 15 day provisioning interval for a total of 18 days.

Metric:

PR 2-08

Average Interval Completed - DS3

Performance:

UNE

18.93 with 14 observations

Retail

14.50 with 2 observations

The retail DS3 guidelines call for a 6 day facility check and a 14 day provisioning interval for a total of 20 days. The actual completed interval for UNE DS3 is consistent with the 18 day guideline described above. It appears that the 2 Retail orders were not entered until after the facility check and therefore only reflect the 14 day provisioning interval. The retail orders should have been entered into SOP prior to the facility check. Then the Retail interval would have reflected the full 20 days and this metric would be in parity.

Service:

RESALE POTS

Metric:

PR 4-04

Missed Appointments - Verizon - Dispatch

Performance:

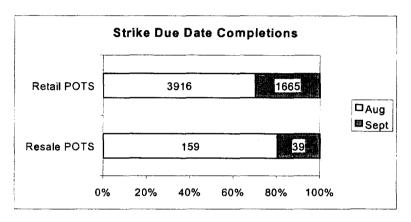
Resale POTS

22.75% with 545 observations

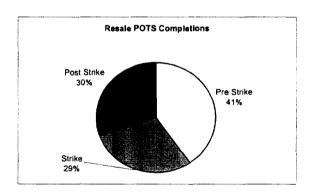
Retail POTS

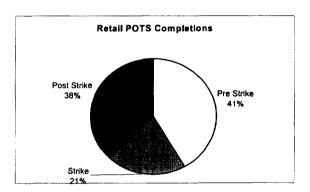
11.17% with 18958 observations

As the following chart indicates, Resale cleared about 80% of the orders with strike due dates in August while Retail cleared about 70%.



This led to about an 8% difference in the distribution of strike-related work in the Resale and Retail POTS bases during August 2000.





Since Verizon did not provision dispatch orders (except for emergencies) during the strike, virtually all dispatch orders with strike due dates were missed. Based on the proportion of strike due dated order in the Resale completions in August, a missed appointment rate of about 29% would be expected. Actual performance was 22.75%.

For Retail POTS the proportion of strike due dates in the base suggest that the missed appointment rate should be about 21%. The reported retail rate was 11.17%. Verizon is investigating whether retail failed to apply the appropriate missed appointment code on these orders.

The greater concentration of orders with strike due dates in the Resale completion base also affected PR 2-03 Average Interval Completed - Dispatch - Res:

<u>VZ</u> 8.82 CLEC 11.27

Service:

RESALE POTS

Metric:

PR 4-02

Average Delay Days - Total

Performance:

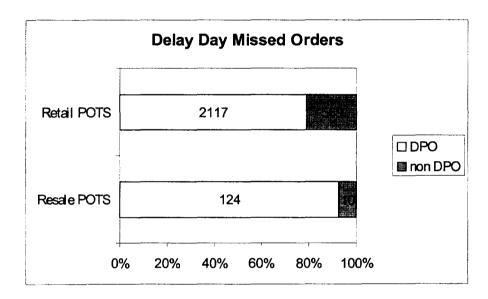
Resale

8.53 with 134 observations

Retail

6.32 with 2686 observations

The average delay day metric for Resale and Retail POTS was impacted by the close-out of strike-related work in the final week of August. This metric has historically averaged between 3 and 4 days for both Retail and Resale. For the report month of August, the gap between Resale and Retail was mainly driven by fact that 20% of the Retail missed appointments were on non dispatch orders which typically are completed the next day and therefore have short delay intervals. In contrast, less than 5% of the Resale POTS missed orders were non dispatched orders.



Service:

RESALE 2 Wire Digital

Metric:

PR 4-04

Missed Appointments - Verizon - Dispatch

Performance:

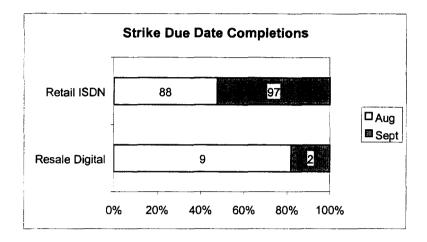
Resale

38.89% with 18 observations

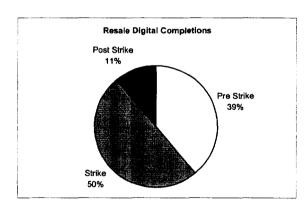
Retail

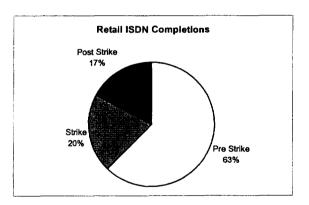
10.47% with 430 observations

As the following chart indicates, Resale Digital cleared more than 80% of the orders with strike due dates in August, while Retail cleared less than 50% of the strike past due work.



This led to a much higher percentage of strike-related misses for the Resale base, as indicated in the next two charts. (Orders are categorized as "pre" or "post" depending on the original due date for the order.)





The greater concentration of orders with strike due dates in the Resale completion base also affected PR 2-02 Average Interval Completed - Total - Dispatch:

 $\frac{Vz}{11.00}$

Resale 16.38

All of the data for Resale Digital must be qualified with the fact this is a very low volume product, typically averaging less than 50 dispatched orders a month.

Service:

RESALE 2 Wire Digital

Metric:

PR 4-02

Average Delay Days - Total

Performance:

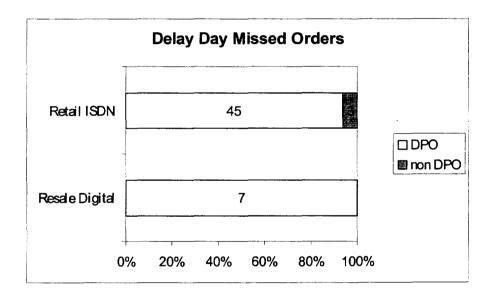
Resale

10.29 with 7 observations

Retail

9.00 with 48 observations

The average delay day metric for 2 wire digital was also impacted by the aggressive effort in August to clear as much of the strike-related backlog as possible. Due to the very low volume of Resale orders in a typical month, the Resale average delay days is often based on 1 or 2 observations and can thus vary a great deal. This metric typically averages between 3 and 5 days for Retail ISDN. Resale 2 wire digital degraded to 10.29 days in August due to the proportionally large number of orders cleared in the final week of the report month that were originally due during the work stoppage. Retail also degraded in August to 9.00; however, the fact that 3 of the misses were short interval non dispatch misses somewhat dampened the impact of their other misses. This accounts for the difference of 1 day in the average delay day performance.



DPO = Dispatch Orders

48.25%

0

53.61%

0

Massachusetts C2C Analysis August 2000

Maintenance:

There was little strike-related impact on the maintenance metrics. Of fifteen key maintenance metrics for UNE and Resale, only 1 appears out of parity as determined by its z score, MTTR - Total for 2 Wire Digital.

UNE:			•		
<u></u>		POTS Loop	POTS <u>Platform</u>	2 Wire <u>Digital</u>	2 Wire xDSL
MR 3-01 Missed Repair Appts	UNE Retail perf score	15.84% 16.71% 0	17.39% 16.71% 0	27.59% 50.96% 0	17.19% 18.21% 0
MR 4-01 MTTR - Total	UNE Retail perf score	30.67 44.03 0	41.95 44.03 0	83.32 44.32 -2	38.97 42.95 0
MR 4-08 OOS 24 Digital	UNE	41.10%	56.03%	59.18%	51.90%

49.15%

0

49.15%

-1

RESALE:

		POTS/ Complex
MR 3-01 Missed Repair Appts	Resale Retail perf score	16.04% 16.71% 0
MR 4-01 MTTR - Total	Resale Retail perf score	30.72 44.03 0
MR 4-08 OOS 24 Digital	Resale Retail perf score	37.06% 49.15% 0

Retail

perf score

Offered Interval Metrics:

Orders received during the work stoppage should have been "R" coded which would exclude them from the interval offered and interval completed metrics upon completion. However, a number of these orders were "W" coded and therefore were not excluded from the interval metrics. Depending on the percent of mis-coded strike orders that were captured in the interval metric, the impact to the results could be dramatic. The following metrics appear to be out of parity because a much larger proportion of the orders in the wholesale base was received during the strike.

RESALE PROVISIONING:			
		Aug	% Rec'd during Strike
PR 1-03 Avg Int Off - Dispatch	Resale	15.33	21.4%
(POTS - Business)	Retail	6.95	4.7%
PR 1-03 Avg Int Off - Dispatch	Resale	15.72	35.1%
(POTS - Residence)	Retail	6.94	12.9%
PR 1-02 Avg Int Off - Dispatch	Resale	14.94	17.6%
(Digital)	Retail	9.74	1.2%

UNE PROVISIONING:

		Aug	% Rec'd during Strike
PR 1-03 Avg Int Off - Dispatch	UNE	11.57	7.1%
(Platform 1-5 lines)	Retail	6.95	4.7%

The 7.1 % for the UNE metric translated into 1 order out of a base 14. The one order had an interval of 84 days. Excluding this mis-coded order would bring the UNE performance to 5.99 days, well within parity.

Massachusetts Strike Analysis - August August Performance with Strike due dates backed out:

The table below shows the impact to performance levels when orders originally due during the work stoppage are removed from the August results. The Resale missed appointment and interval completed metrics came back into parity. The UNE missed appointment metrics substantially narrowed the margin of performance.

xDSL	PR 4-04 Missed Appointments - Verizon - Dpo	UNE	30.38%	10.21%
		Retail	9.89%	5.18%
		Perf score	-2	-2
Digital	PR 4-04 Missed Appointments - Verizon - Dpo	UNE	24.91%	14.58% ***
		Retail	10.47%	5.26%
		Perf score	-2	-2
Platform	PR 4-04 Missed Appointments - Verizon - Dpo	UNE	24.24%	20.00%
		Retail	11.17%	8.97%
		Perf score	-2	-2
Loop	PR 4-04 Missed Appointments - Verizon - Dpo	UNE	24.66%	10.00%
		Retail	11.17%	8.97%
		Perf score	-2	0
POTS	PR 4-04 Missed Appointments - Verizon - Dpo	Resale	22.75%	8.29%
		Retail	11.17%	8.97%
		Perf score	-2	0
Digital	PR 4-04 Missed Appointments - Verizon - Dpo	Resale	38.89%	0
		Retail	5.26%	5.26%
		Perf score	-2	0
POTS - Res	PR 2-03 Avg Int Cmp - Dispatch	Resale	11.27	7.51
		Retail	8.82	6.20
		z score	-2	0
Digital	PR 2-02 Avg Int Cmp - Dispatch	Resale	16.38	12.13
		Retail	11.00	11.00
		z score	-2	0
		1		

(Shading indicates statistical non-parity performance)

Massachusetts Strike Analysis - August

August Performance with Orders Received During the Strike backed out:

The table below shows the impact to performance levels when orders originally received during the work stoppage are removed from the August results. Each of the interval offered metrics come back into parity.

POTS - Business	PR 1-03 Avg Int Off - Dispatch	Resale	45.33 编示	4.23
		Retail	6.95	6.15
		z score	-2	0
POTS - Residence	PR 1-03 Avg Int Off - Dispatch	Resale	15.72	5.45
		Retail	6.94	5.66
		z score	-2	0
Digital	PR 1-02 Avg Int Off - Dispatch	Resale	14.94	11.2
		Retail	9.74	8.83
		z score	-2	0
Platform (1-5 lines)	PR 1-03 Avg Int Off - Dispatch	UNE	11.57	6.00
		Retail	6.95	6.15
		z score	-2	0

(Shading indicates statistical non-parity performance)

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POTS	PR 4-02 Average Delay Days - Total	9
Specials	PR 1-07 Average Interval Offered - DS1	10
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Digital	PR 2-02 Average Interval Completed - Total - Dispatch	12
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Attachment B - Joint Reply Declaration of Elaine M. Guerard and Julie A. Canny - 21 of 31

Massachusetts C2C Analysis September 2000

OVERVIEW:

The accompanying analysis of the Massachusetts C2C was undertaken in order to assess the impact of the August work stoppage on the provisioning and maintenance parity metrics.

September:

In September, 10 of the 25 metrics examined in August have reported results out of parity. Mis-coding at the time of order entry and SOP completion are the primary cause of these results in 5 of the 10 metrics. Three additional metrics were attributable to differences in the proportion of strike-related orders in the overall base. One metric, Resale Digital Average Interval Completed - Dispatch just exceeded the -1 performance threshold.

AUGUST to SEPTEMBER TRENDS:

Cal adi				
xDSL	PR 4-04 Missed Appointments - Verizon - Dispatch	UNE	30.38%	9.16% ×
		Retail	9.89%	7.13%
	PR 2-02 Average Interval Completed - Total - Dispatch	UNE	12.04	
		Retail	8.15	11.44
	PR 4-02 Average Delay Days - Total	UNE	9.62	11.51
	1 R 4-02 Average Delay Days - Total	Retail	3.23	12.62
		Keun	3.23	12.02
	PR 3-10 % Completed within 6 days	UNE	40.29%	56,33%
		Retail	62.39%	65.54%
-				
Digital	PR 4-04 Missed Appointments - Verizon - Dispatch	UNE	24.91%	4.92%
		Retail	10.47%	12.48%
	PR 2-02 Average Interval Completed - Total - Dispatch	UNE	13.76	11.15
		Retail	11.00	13.70
	DR 4 02 Average Delev Deve Total	UNE	10.03	10.69
	PR 4-02 Average Delay Days - Total	Retail	9.00	14.65
		Ketan	9.00	14.03
Platform	PR 4-04 Missed Appointments - Verizon - Dispatch	UNE	24.24%	19.05%
1 tataon in	TAX 1 0 1 Ambout Appointments 1 of the or	Retail	11.17%	8.70%
Loop	PR 4-04 Missed Appointments - Verizon - Dispatch	UNE	24.66%	9.62%
		Retail	11.17%	8.70%
	PR 1-03 Avg Int Off - Dispatch	UNE	9.64	10.50
		Retail	6.95	7.88
	DD 2 02 Ave Int Com. Dispetch	UNE	17:86	8.53
	PR 2-03 Avg Int Cmp - Dispatch	Retail	9.65	8.82
-		Ketan	7.03	0.02
POTS	PR 4-02 Average Delay Days - Total	UNE	8.85	6.05
		Retail	6.32	4.64
Specials	PR 1-07 Average Interval Offered - DS1	UNE	24.50	22.44
		Retail	18.55	15.69
	PR 1-08 Average Interval Offered - DS3	UNE	28.58	28.57
		Retail	14.50	NA
		<u> </u>		
	PR 2-08 Average Interval Completed - DS3	UNE	18.93	27.27
		Retail	14.50	NA

(Shading indicates statistical non-parity performance)

POTS	PR 4-04 Missed Appointments - Verizon - Dispatch	Resale	22.75%	6.04%
		Retail	11.17%	8.70%
	PR 2-03 Avg Int Cmp - Dispatch	Resale	11.27	7.67
		Retail	8.82	7.32
	PR 4-02 Average Delay Days - Total	Resale	8.53	9.05
		Retail	6.32	4.64
Digital	PR 4-04 Missed Appointments - Verizon - Dispatch	Resale	38.89%	5.26%
		Retail	10.47%	12.48%
	PR 2-02 Avg Int Cmp - Dispatch	Resale	16:38	16.17
		Retail	11.00	13.70
	PR 4-02 Average Delay Days - Total	Resale	10.29	9.00
		Retail	9.00	14.65

Digital	MR 4-01 MTTR - Total	UNE	83.32	31.17
		Retail	44.32	32.48
POTS	MR 4-08 % OOS 24	UNE	56.03%	27.35
Platform		Retail	49.15%	32.59

POTS - Business	PR 1-03 Avg Int Off - Dispatch	Resale	·1533 (42)	7.02
		Retail	6.95	7.88
POTS - Residence	PR 1-03 Avg Int Off - Dispatch	Resale	15.72	7.69
		Retail	6.94	6.67
Digital	PR 1-02 Avg Int Off - Dispatch	Resale	14.94	31.56
		Retail	9.74	11.01
Platform (1-5 lines)	PR 1-03 Avg Int Off - Dispatch	UNE	11.57	8.90
		Retail	6.95	7.88

(Shading indicates statistical non-parity performance)

Service:

UNE 2 Wire xDSL

Metric:

PR 4-04

Missed Appointments - Verizon - Dispatch

Performance:

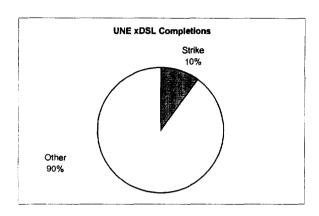
UNE

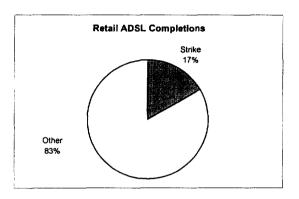
9.16% with 3559 observations

Retail

7.13% with 842 observations

Orders that were originally due during the strike continued to affect missed appointment results in September, but at a reduced level from August results.





Since Verizon did not provision dispatch orders (except for emergencies) during the strike, virtually all dispatch orders with strike due dates were missed. Based on the proportion of strike due dated order in the UNE completions shown above, the missed appointment rate for UNE should be about 10% and Retail should be about 17%. The actual UNE missed appointment performance tracks well with the expected result; the Retail rate is much lower than expected. Verizon is investigating whether retail failed to apply the appropriate missed appointment code on these orders. The missed appointment performance for each segment of the graph breaks out as follows:

	Retail	<u>UNE</u>
Strike	12.85%	68.5%
Other	5.98%	2.56%
Total	7.13%	9.16%

Service:

UNE 2 Wire xDSL

Metric:

PR 3-10

% Completed in 6 Days (1-5 Lines - Total)

Performance:

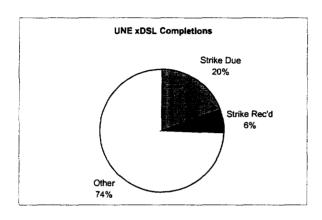
UNE

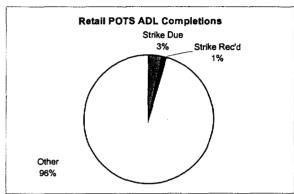
56.33% with 909 observations

Retail ADL

65.54% with 13,433 observations

As orders originally due or received during the strike continue to decline from August, the gap between UNE and Retail performance has narrowed in September.





If orders originally due or received during the strike (and therefore not given the normal 6-day interval or completed in 6 days) are removed from the September results, the performance comes into parity as shown in the following table:

Original	September
Results	

Excluding Strike Due Dates and Orders Rec'd During Strike

UNE xDSL

performance:

56.33%

69.67%

Retail ADL

performance:

65.54%

68.54%